

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

John Adamidis,)
Plaintiff,) 19 C 7652
vs.) Judge Manish S. Shah
Cook County, et al.) Magistrate Judge Young B. Kim
Defendants.)

**DEFENDANT COOK COUNTY MOTION FOR ENTRY OF ORDER
IN LIEU OF ANSWER**

NOW COMES the Defendant, Cook County (hereinafter “Defendant”) by its Attorney KIMBERLY M. FOXX, State’s Attorney of Cook County, through her assistant, ALEXIS D. M. CARR, pursuant to Federal Rule of Civil Procedure 8, and respectfully moves this Court to enter an order in lieu of answer to the Plaintiff’s complaint. In support of this motion, Defendant states the following:

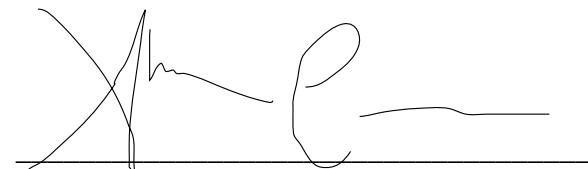
1. On November 20, 2015 Plaintiff through counsel filed a complaint naming Defendant and Unknown Sheriff’s Police Officers as Defendants. [Dkt. 1].
2. Plaintiff states in his complaint his only purpose for naming Defendant is for indemnity purposes. [Dkt. 1].
3. Plaintiff sought the names of the Unknown Sheriff’s Police Officers from the Cook County Sheriff’s Department in the form of a subpoena. [Dkt. 4,5,7]
4. Waiver of Service was returned executed by Defendant on or before January 17, 2020. [Dkt. 12].
5. The undersigned attorney filed her appearance on January 24, 2020. [Dkt. 13].

6. In light of Plaintiff's complaint, Defendant Cook County respectfully requests that this Court enter the proposed Order in Lieu of Answer, emailed to: Proposed_Order_Shah @ ilnd.uscourts.gov per this Court's standing orders. The proposed order states, in sum, as follows: This Court finds: (1) There is no basis for liability on the part of Defendant Cook County articulated in Plaintiff's complaint (2) Cook County remains in this case as a necessary party solely for purposes of indemnification and (3) Cook County is not obligated to file an answer to Plaintiff's complaint.

WHEREFORE Defendant, Cook County, respectfully requests that this Honorable Court issue an order in lieu of answer to Plaintiff's Complaint, and for such other and further relief as the Court deems necessary and appropriate.

Respectfully submitted,
Kimberly M. Foxx
State's Attorney of Cook County

By:



Alexis D. M. Carr
Assistant State's Attorney
Cook County State's Attorney's Office
500 Richard J. Daley Center
Chicago, Illinois 60601
(312) 603-3141